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To Whom it May Concern;

The Dixon Entrance Chapter of the Society of American Foresters is happy to offer the following brief comments concerning the draft Tongass Land Management Plan. Primarily, these comments address the points raised under the [ldquo]Terrestrial Ecosystems[rdquo] and [ldquo]Timber Resource Assessment[rdquo] portions of the draft Plan.

Our Chapter consists of many members who are either actively involved in the current timber industry, both in the private sector and in the public sector, or are retired from those sectors. As such, we are very much aware of the resources that have historically been a part of the timber industry here, but of a lesser extent the current status of the Tongass timber resources. The information provided in the draft Plan helps in providing these informed comments.

The Plan identifies approximately 3.5 million acres as old growth (150 years age+) [ldquo]Well Drained Forest Land[rdquo], while another 558 thousand acres lies in young growth stands of various age classes. These harvested acres comprise only 8% of the [ldquo]total productive[rdquo] forest land on the Tongass Forest identified in your assessments. This is a staggering low percentage of utilized timber resources and indicates the still largely intact nature of the Tongass National Forest.

Examining the Tongass timber sale schedule since the 2016 Plan revision, it[rsquo]s the Chapter[rsquo]s opinion that the [ldquo]Sustained Yield Limit[rdquo] (SYL) of 248 MMBF annually has obviously never been approached and, certainly for the past few years, neither has the [ldquo]Projected Timber Sale Quantity[rdquo] (PTSQ) of 46 MMBF. And with the advent of increased merchantable volumes of second growth coming online, the 2016 Plan target of increasing the PTSQ to 72 MMBF annually in the next decade equally looks unattainable by the Forest Service[rsquo]s current timber team [ndash] for whatever reason, be it from understaffing, too constrictive regulatory guidelines, or the lack of qualified personnel capable of putting forth economical timber sales. The Plan revision MUST address this inability to offer adequate timber sale volumes of sizable means that the remaining southeast Alaska industry can utilize in an economical fashion.

One final point: The 2016 Plan called for decreasing the old growth volume component of timber sales to 5 MMBF annually starting in 2031 (recent annual Tongass timber sales have also averaged this amount) . Many of us in the Chapter have cruised and evaluated Tongass old growth stands for most of our entire career,

and we know that a merely decent stand of old growth can easily average 20 MBF per acre, and applying this to harvesting just 5 MMBF per year equates to only 250 acres annually. The 2016 Plan also indicated there were approximately 260,000 acres of harvestable old growth available, and Table 6 in the current Draft Timber Resources Assessment shows only 1,529 old growth acres were harvested between 2016 and 2023, leaving 258,471 old growth acres still available for harvest. Applying the estimate of cutting 250 acres annually means it will take 1,084 years to fully harvest the remaining productive old growth acres. If the intent of the Forest Service is to drastically increase the amount of 1,000 year old, large diameter, old growth trees on the Forest then this Plan revision will certainly result in that. It seems that should not be the unspoken, desired outcome of this Plan revision though, and certainly not the best use of a valuable timber resource.

Thank you for the opportunity to provide comment.

Bob Durland, Chair

Dixon Entrance Chapter

Society of American Foresters